

## **REMARKS**

No claims have been amended. Claims 1-31 are pending in this application.

Claims 1-5 and 7-31 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hunter (U.S. 5,280,531) in view of Moore (U.S. 5,917,925). Claim 6 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Hunter in view of Moore and further in view of Fleming (U.S. 5,953,710). Reconsideration is respectfully requested.

The present invention is directed to a mail piece verification system for processing a mail piece that includes an incoming mail processing center for receiving a mail piece and obtaining data from the mail piece. The mail piece data is uploaded to a data center that performs a verification check on the mail piece data and downloads instructions, based upon the verification check, to an outgoing mail processing center located downstream from the incoming mail processing center. The outgoing mail processing center then uses the instructions, received from the data center, to process the mail piece.

In view of the above, claim 1 is directed to a mail piece verification system for processing mail pieces that comprises “an incoming mail processing center for receiving the mail piece and obtaining the mail piece data, the incoming mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; an outgoing mail processing center located downstream in the path of travel from the incoming mail processing center, the outgoing mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; and a data center in operative communication with the incoming mail processing center and the outgoing mail processing center” wherein “the incoming mail processing center uploads the mail piece data to the data center; the data center performs a verification check on the mail piece data and downloads instructions based upon the verification check to the outgoing mail processing center; and the outgoing mail processing center uses the instructions to control operation of at least one of the mail processing machines located at the outgoing mail processing center to process the mail piece.”

Hunter is directed to a method and system for analyzing the usage of postage meters with respect to the history of meter recharges for the purpose of detecting fraudulent or improper usage of the meters. In Hunter, a conventional transport system singulates a mail stream and transports mail pieces past a conventional optical character recognition (OCR) system. As each mailpiece is transported past the OCR system, the postal indicia is scanned to read at least the postage amount and meter identification number. The OCR is connected to a data processing system into which the meter identification numbers and postage amounts are input, which produces expenditure reports that describe the expenditures of particular meters as identified by the meter identification number in the postal indicia. The refill history of particular meters is also input into the data processing system. The data processing system produces discrepancy reports that identify those meters where expenditures differ from what would be expected in light of the refill history by more than some predetermined threshold. (See Col. 2, line 48 to Col. 3, line 42).

Thus, the system in Hunter simply scans postage indicia and stores a cumulative record of postage amounts expended by a meter, and compares the amount expended with a refill amount to determine if a large discrepancy exists, i.e., if the meter is printing more postage than has been refilled to the meter. If a discrepancy exists, a report is generated to identify the meter such that an appropriate inspection of the meter can be performed. There is no disclosure, teaching or suggestion in Hunter of an "incoming mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; an outgoing mail processing center located downstream in the path of travel from the incoming mail processing center, the outgoing mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; and a data center in operative communication with the incoming mail processing center and the outgoing mail processing center" wherein "the incoming mail processing center uploads the mail piece data to the data center; the data center performs a verification check on the mail piece data and downloads instructions based upon the verification check to the outgoing mail processing center; and the outgoing mail processing center uses the instructions to control operation of at least one of the mail processing machines located at the outgoing mail processing center to process the mail piece" as is recited in claim 1.

The reference to Moore does not cure any of the above deficiencies. Moore is directed to a method for authenticating indicia marks to reduce the amount of counterfeit marks. The system generates a unique pattern comprising encoded input data that comprises a unique customer identifier and a unique postal service identifier. The unique pattern is applied to a mail piece as an indicia using an ink formulation comprising one or more chemical agents detectable when exposed to a visible or non-visible frequency range of light. The authentication process is completed by exposing the goods to light in the visible or non-visible frequency range thereby making the pattern detectable, scanning the detectable pattern on the mail piece, degenerating the pattern to retrieve the encoded input data, decoding the encoded data to retrieve the input data, and comparing the input data against all stored input data in a mass storage device to determine whether the indicia is authentic. (Col. 8, lines 1-24).

Note that the scanning performed in the system of Moore is done utilizing a field reader that is a hand held device housed in a briefcase or the like. (Col. 24, lines 7-10). At any point within the mail system the indicia mark affixed to the mail piece can be read on site with the field reader. All information contained in the indicia mark is transmitted back to the appropriate host computer if the information pertains directly to the customer or is "customer specific," or transmitted back to the control computer 12 if the information pertains to the postal service operation or the vendor's operation. (Col. 11, lines 8-17). The control computer 12 and the host computer 14 receive the data from the field reader, and interface with the encryption unit 15 where the message is decoded and converted to clear text. The control computer then searches the database to validate the indicia mark and any other postal service specific information. The host computer reads and validates any customer specific information. Once validated, both the control and the host computers send messages back to the field reader 18 which displays the decoded message and any other pertinent information pertaining to this specific indicia, i.e., place, time of marking, or destination. If the marked mail piece is counterfeit or has been received at the wrong point of final distribution, an invalid signal is transmitted and displayed on the field reader computer screen. (Col. 12, lines 25-43). The reader receives validation while the goods are under the custody and control of the reader operator. (Col. 13, lines 60-62).

Thus, in Moore, a postal clerk scans a mail piece, using a hand held reader device. Information from the mail piece is transmitted to a computer, where the information is validated. A message, including the information from the mail piece, is then returned to the reader device to display to the postal clerk. If the indicia is counterfeit, an invalid signal is displayed. The system in Moore, however, discloses no more than that as described with respect to conventional verification systems on page 3 of the present Specification. Note that in Moore, the mail piece must be removed from the mail piece processing path by a postal clerk, scanned by the postal clerk using the hand held reader, and then remain with the postal clerk after it has been scanned while the data is transmitted to the control computer and host computer, the data is validated by the control computer and host computer, and a message from each computer is returned to the reader held by the postal clerk. The amount of time required to perform this operation would make it impossible to verify any more than a minimal amount of mail pieces currently processed by the postal service.

The present invention, in contrast, comprises an incoming mail processing center, which may employ one or more mail processing machines, and an outgoing mail processing center, which may employ one or more of the same mail processing machines, that is located downstream in the path of travel from the incoming mail processing center. The incoming mail processing center obtains the mail piece data and uploads the mail piece data to the data center. The data center performs a verification check on the mail piece data and downloads instructions, based upon the verification check, to the outgoing mail processing center. The outgoing mail processing center uses the instructions received from the data center to control operation of at least one of the mail processing machines to process the mail piece. There is no disclosure, teaching or suggestion in Moore of an incoming mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces and an outgoing mail processing center that includes a plurality of mail processing machines that perform automated processing of mail pieces, where the incoming mail processing center obtains the mail piece data and uploads the mail piece data to the data center, the data center performs a verification check on the mail piece data and downloads instructions, based upon the verification check, to the outgoing mail processing center, and the outgoing mail processing center uses the instructions received from the data center to

control operation of at least one of the mail processing machines located at the outgoing mail processing center to process the mail piece.

Even if, for arguments sake, the hand held field reader of Moore was deemed to be analogous with an outgoing mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces (which it clearly is not), the system of Moore does not use the instructions downloaded from a data center to control operation of a mail processing machine that performs automated processing of mail pieces to process the mail piece.

There is simply no disclosure, teaching or suggestion in either Hunter or Moore, alone or in combination, of a mail piece verification system for processing a mail piece that comprises an outgoing mail processing center located downstream in the path of travel from the incoming mail processing center, the outgoing mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; and a data center in operative communication with the incoming mail processing center and the outgoing mail processing center wherein the incoming mail processing center uploads the mail piece data to the data center; the data center performs a verification check on the mail piece data and downloads instructions based upon the verification check to the outgoing mail processing center; and the outgoing mail processing center uses the instructions to control operation of at least one of the mail processing machines located at the outgoing mail processing center to process the mail piece as is recited in claim 1.

For at least the above reasons, Applicants respectfully submit that claim 1 is allowable over the prior art of record. Claims 2-14, dependent upon claim 1, are allowable along with claim 1 and on their own merits.

Applicants also wish to point out some of the features of the dependent claims. Claim 2 includes the feature of the verification check including cryptographic calculations to determine whether or not the mail piece data is valid. The Office Action contends that Col. 2, lines 56-65 of Hunter disclose this feature. Applicants respectfully disagree. Col. 2, lines 56-65 of Hunter are reproduced below:

As each mail piece is transported past OCR system 20 the postal indicia (not shown) is scanned in a conventional manner to read at least the postage amount and the meter identification number which are incorporated in all postal indicia produced by postage meters in accordance with the Domestic Mail Manual of the U.S. Postal Service. OCR scanning is a conventional, well known technique used, for example, to process hundreds of millions of credit card slips each year.

The Office Action has not provided any rationale as to how a discussion about OCR scanning discloses, teaches or suggests using cryptographic calculations. There is nothing anywhere in this passage, or anywhere else in Hunter, for that matter, that discloses, teaches or suggest using cryptographic calculations to determine if mail piece data is valid or not. The discussion about using OCR is in no way related to cryptographic calculations.

Claims 3 and 10 include the feature of the verification check including a duplicate detection analysis to determine whether or not the mail piece data has been fraudulently copied. The Office Action contends that Col. 2, lines 58-62 of Hunter disclose this feature. Applicants respectfully disagree. Col. 2, lines 58-62 of Hunter are reproduced above. There is nothing anywhere in this passage, or anywhere else in Hunter, that discloses, teaches or suggests duplicate detection analysis to determine if mail piece data has been fraudulently copied.

Claims 4 and 7 include the feature of the system using the mail piece data to determine a delivery route for the mail piece, the outgoing mail processing center representing a particular one of a plurality of outgoing mail processing centers that corresponds to the delivery route, and the data center limits the download of instructions to the particular one of the plurality of outgoing mail processing centers. The Office Action contends that Col. 13, lines 30-55 of Moore disclose these features. Applicants respectfully disagree. Col. 13, lines 30-55 of Moore are reproduced below.

The foregoing discussion has been directed to the invention embodied as a postal indicia marking and tracking system. Other embodiments of the system for anti-counterfeiting and anti-diversion systems are also possible. An added feature of the present invention is the real-time nature of validation in any embodiment. Piracy, counterfeiting, and/or diversion commonly occur at the plant or just beyond its gates. The present system allows the functionality of immediate interception on the yard, or the backdoor of the plant. A field reader may be used for inspection

at the plant gate to verify that goods going out of the plant gates are authentic, marked, and correctly routed. As a further example, a field reader or point of distribution and sale reader may be used to "instantly" authenticate a package module, mailpieces, invoices, or any marked article at the time of receipt, sale or processing. It should be understood, however, that this can only authenticate the printed document, and can not authenticate any signature affixed thereto which may or may not be forged. The creation and marking of marks is real-time. The marker PC at the site reports back to the host computer and therefore all the markings that have been prepared for the day's operation will be in the archives or in the records of the host computer 14. Immediately after the goods are marked, they can be inspected and a reading determines the (in)validity of the mark through the host computer 14.

There is nothing in this passage, or anywhere else in Moore, that discloses, teaches or suggests using mail piece data to determine a delivery route for a mail piece, or of a data center limiting the download of instructions to a particular one of a plurality of outgoing mail processing centers that corresponds to the delivery route.

Claims 5 and 8 includes the feature of the system using the mail piece data to determine a service class for the mail piece, and the system uses the service class to establish a priority for the upload of mail piece data from the incoming mail processing center to the data center and the download of instructions from the data center to the outgoing mail processing center. The Office Action contends that Fig. 2 and Col. 5, lines 54-63 of Hunter disclose these features. Applicants respectfully disagree. Col. 5, lines 49-63 of Hunter are reproduced below.

FIG. 2 shows a flow chart of the operation of data processing system 40 in scanning a mail piece. At 110 system 40 inputs the next mail piece scan and at 112 tests to determine if the meter identification number is recognized; that is, is the meter identification number is legible and valid for this system. If the meter identification number is recognized then at 114-system 40 checks to determine if that number is included in the meter inspection file. If the number is not in meter inspection file 80 then at 116 system 40 tests to determine if the postage amount is recognized as a valid amount; that is, is valid for that class of mail and is legible. If the postage amount and meter identification number are recognized then at 120 the expenditure record for the identified meter is incremented.

There is nothing in this passage, or anywhere else in Hunter, of any type of determination of service class for a mail piece, or using the service class to establish a priority for the upload of mail piece data from the incoming mail processing center to the data center and the download of instructions from the data center to the outgoing mail processing center.

Claim 6 includes the feature of the system assigning a global identification number to the mail piece that is used by the system to access the mail piece data and instructions associated with the mail piece. The Office Action contends that Hunter discloses a mail piece that contains serial numbers (Col. 2, lines 3-24). On the mail pieces in Hunter, however, the meter serial number is provided. This meter serial number will be the same on every mail piece processed by that meter. The system in Hunter does not assign a global identification number to each mail piece. On page 5 of the Office Action, it is stated that "Hunter and Moore fail to disclose wherein the responsive action includes issuing a new identification number to replace an existing identification number and the data center providing instructions to the plurality of processing centers to withhold processing of items associated with the existing identification number while allowing normal processing of items associated with the new identification number." The Office Action then relies on the reference to Fleming. Applicants wish to point out that these features are not recited in claim 6, nor in any other claim pending in this application. This rationale for this rejection has been copied from a different case, having different claims and directed to a different invention, and has no bearing with respect to the current claims, and therefore is clearly improper.

Claim 15 includes limitations substantially similar to those of claim 1. For the same reasons claim 1 is allowable over the prior art of record, Applicants respectfully submit that claim 15 is allowable over the prior art of record. Claims 16-26, dependent upon claim 15, are allowable along with claim 15 and on their own merits.

Claim 27 includes limitations substantially similar to those of claim 1. For the same reasons claim 1 is allowable over the prior art of record, Applicants respectfully submit that claim 27 is allowable over the prior art of record. Claims 28-31, dependent upon claim 27, are allowable along with claim 27 and on their own merits.



In view of the foregoing remarks, it is respectfully submitted that the claims of this case are in a condition for allowance and favorable action thereon is requested.

Respectfully submitted,

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